

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

ROSY GIRON DE REYES; JOSE DAGOBERTO REYES; FELIX ALEXIS BOLANOS; RUTH RIVAS; YOVANA JALDIN SOLIS; ESTEBAN RUBEN MOYA YRAPURA; ROSA ELENA AMAYA; and HERBERT DAVID SARAVIA CRUZ,

Plaintiffs,

vs.

WAPLES MOBILE HOME PARK LIMITED PARTNERSHIP; WAPLES PROJECT LIMITED PARTNERSHIP; and A.J. DWOSKIN & ASSOCIATES, INC.,

Defendants.

Civil Action No. 1:16cv00563-TSE-TCB

NOTICE OF PLAINTIFFS' MOTION TO FILE DOCUMENTS UNDER SEAL

Pursuant to Local Civil Rule 5, Plaintiffs Rosy Giron De Reyes, Jose Dagoberto Reyes, Felix Alexis Bolaños, Ruth Rivas, Yovana Jaldin Solis, Esteban Ruben Moya Yrapura, Rosa Elena Amaya, and Herbert David Saravia Cruz (“Plaintiffs”) are filing a Motion to File Documents under Seal (“Motion”). In support of this Motion, Plaintiffs are submitting a Non-Confidential Memorandum in Support of Plaintiffs’ Motion to File Documents under Seal, along with this Notice and a Proposed Order.

This document serves as notice to the public that Plaintiffs, by counsel, have moved the Court to seal from public disclosure Exhibits 2, 4–6, and 9 to Plaintiffs’ Reply in Support of Plaintiffs’ Cross Motion for Summary Judgment. A brief description of the content of these documents is as follows:

- Ex. 2: Excerpts from the deposition transcript of George C. Caruso.

- Ex. 4: Excerpts from the deposition transcript of Josephine Giambanco.
- Ex. 5: Excerpts from the deposition transcript of Dr. Daniel H. Weinberg.
- Ex. 6: Excerpts from the deposition transcript of Professor William A.V. Clark.
- Ex. 9: Declaration of Archith Ramkumar, Esq., discussing confidential exhibits.

Objections to this Motion to File Documents Under Seal should be filed in the Civil Section of the Clerk's Office of this Court. This Notice will be posted for a minimum of 48 hours.

DATED this 17th day of January, 2017 Respectfully submitted,



QUINN EMANUEL URQUHART &
SULLIVAN, LLP

Paul Brinkman, VSB # 35950
Jeanhee Hong (*pro hac vice*)
Ariel Wade Trajtenberg (*pro hac vice*)
Diego Durán de la Vega (*pro hac vice*)
Jongwook Kim (*pro hac vice*)
William A. Margeson (*pro hac vice*)
Archith Ramkumar (*pro hac vice*)

777 Sixth Street NW, 11th Floor
Washington, District of Columbia 20001
Phone: (202) 538-8000
Fax: (202) 538-8100

paulbrinkman@quinnmanuel.com
jeanheehong@quinnmanuel.com
arieltrajtenberg@quinnmanuel.com
diegoduran@quinnmanuel.com
wookiekim@quinnmanuel.com
billmargeson@quinnmanuel.com
archithramkumar@quinnmanuel.com

LEGAL AID JUSTICE CENTER
Simon Sandoval-Moshenberg, VSB #77110
Rebecca Wolozin, VSB #89690

6066 Leesburg Pike, Suite 520
Falls Church, VA 22041
Phone: (703) 778-3450
Fax: (703) 778-3454
simon@justice4all.org
becky@justice4all.org

Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on the 17th day of January, 2017, I filed the foregoing document electronically with the Clerk of the Court using the ECF system, and caused to be served by electronic mail a copy of the foregoing document upon the following parties:

Grayson P. Hanes, VSB # 06614
Michael S. Dingman, VSB #30031
Justin deBettencourt, VSB # 83806
REED SMITH LLP
7900 Tysons One Place, Suite 500
McLean, Virginia 22102
Phone: (703) 641-4200
Fax: (703) 641-4340
ghaynes@reedsmith.com
mdingman@reedsmith.com
jdbettencourt@reedsmith.com

Counsel for Defendants



QUINN EMANUEL URQUHART &
SULLIVAN, LLP
Paul Brinkman, VSB # 35950

777 Sixth Street NW, 11th Floor
Washington, District of Columbia 20001-3706
Phone: (202) 538-8000
Fax: (202) 538-8100
paulbrinkman@quinnemanuel.com

Counsel for Plaintiffs